

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**

NATURAL ESSENTIALS INC.	)	
115 Lena Drive	)	
Aurora, OH 44202	)	CASE NO. 5:21-cv-00823
	)	
Plaintiff	)	JUDGE JOHN R. ADAMS
	)	
vs.	)	
	)	<b>RESPONSE TO MOTION FOR</b>
OLYMPIA SPORTS COMPANY, INC.	)	<b>EXTENSION CONTAINED IN</b>
281 Fields Lane	)	<b>LETTER OF MR. ROGER HEUMANN</b>
Brewster, New York 10509	)	
	)	
Defendant	)	

Plaintiff Natural Essentials Inc. (“Natural Essentials”) did not have the opportunity to consider any specific proposal for an extension of time for the answer deadline of Olympia Sports Co., Inc. (“Olympia”). Natural Essentials is not aware of any obstacle to Olympia’s retention of local counsel in order to appear appropriately in this action. *See Rowland v. California Men’s Colony, Unit II Men’s Advisory Council*, 506 U.S. 194, 201-02 (“a corporation may appear in the federal courts only through licensed counsel”); *Prakash v. Altadis U.S.A. Inc.*, No. 5:10CV0033, 2012 WL 1109918, at \*6 (N.D. Ohio Mar. 30, 2012).

Olympia indicates that there may be “motion practice” in other courts, but Natural Essentials is not sure what this means. Although a summons was generated in New York, Olympia has not yet filed a complaint to initiate any proceeding, declaratory or otherwise, against Natural Essentials.

Natural Essentials does not oppose a reasonable extension of time to allow Olympia to secure Ohio counsel and file its responsive pleading.

Respectfully submitted,

/s/ Laura E. Kogan

Laura E. Kogan (0087453)

Yelena Boxer (0071379)

James E. von der Heydt (0090920)

**BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP**

200 Public Square, Suite 2300

Cleveland, Ohio 44114-2378

Telephone: 216.363.4500

Facsimile: 216.363.4588

Emails: yboxer@beneschlaw.com  
jvonderHeydt@beneschlaw.com  
lkogan@beneschlaw.com

*Attorneys for Plaintiff Natural Essentials Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 12, 2021, a copy of the foregoing Response was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Laura E. Kogan

Laura E. Kogan

*Attorney for Plaintiff Natural Essentials Inc.*